

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

KIRAN KUMAR CHANDRA SHEKAR,
on behalf of himself and all others similarly situated,

Plaintiff,

v.

ACCURATE BACKGROUND, INC.,
successor in interest to Hirease, Inc.,

Defendant.

No. 2:17-cv-585-LA

**STIPULATION REGARDING CASE
MANAGEMENT DEADLINES**

IT IS HEREBY STIPULATED AND AGREED by and between the Parties:

WHEREAS, on September 12, 2018, the Court entered an Order ratifying the Parties' Stipulation Regarding Case Management Deadlines (Doc. 32), considering the Parties' representations that they had taken significant written discovery and would engage in a mediation on November 29, 2018 with mediator Rodney A. Max;

WHEREAS, on November 29, 2018, the Parties engaged in a day-long mediation with Mr. Max and, while unable to settle the case, made significant progress toward its resolution;

WHEREAS, on December 4, 2018, counsel for Plaintiff served deposition notices upon counsel for Defendant and requested an opportunity to meet and confer regarding same;

WHEREAS, on December 7, 2018, counsel for Defendant notified counsel for Plaintiff that, given the holidays and the travel and work schedules of counsel and the individuals noticed for deposition, that the individuals noticed for deposition would not be available for deposition until January of 2019;

WHEREAS, on December 10, 2018, counsel for the Parties met and conferred regarding scheduling depositions for both parties and completing written discovery responses relating to

class certification, and determined that depositions of multiple witnesses could occur during the weeks of January 7th and/or 28th;

WHEREAS, in light of the end of the year holidays, the above-noted scheduling challenges, and the parties' ongoing case resolution discussions, good cause exists to extend the existing case management schedule by sixty (60) days to allow the Parties time to continue taking relevant discovery in furtherance of their settlement discussions and in anticipation of Plaintiff's motion for class certification;

THEREFORE, subject to the Court's endorsement of their agreement, the Parties stipulate that the following case management deadlines shall be extended as follows:

Event	Existing Deadline	Proposed Deadline
Plaintiff's Motion for Class Certification	Jan. 14, 2019	March 15, 2019
Defendant's Opposition to Class Certification	Feb. 11, 2019	April 12, 2019
Plaintiff's Reply in Support of Class Certification	Feb. 25, 2019	April 26, 2019

Dated: December 11, 2018

Respectfully submitted,

/s/Jordan M. Sartell

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Attorneys for Defendant

SO ORDERED at Milwaukee, Wisconsin, this 12th day of December, 2018.

s/Lynn Adelman
LYNN ADELMAN United
States District Judge